

K&L GATES LLP

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Counsel for Innovative Routines International, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SYNCSORT INCORPORATED, : No. 2:10-cv-1170

Plaintiff, : **Judge Walls**

vs.

**INNOVATIVE ROUTINES
INTERNATIONAL, INC.,**

Defendant. :

**DEFENDANT'S UNOPPOSED MOTION FOR AN EXTENSION
OF TIME TO FILE ITS RESPONSE TO THE COMPLAINT**

Defendant Innovative Routines International, Inc. ("IRI"), respectfully moves for an extension of time in which to file its response to the complaint.

1. Plaintiff Syncsort Incorporated filed its complaint on March 4, 2010, and provided a copy of it to counsel for IRI just more than a week later.

2. IRI agreed to accept service of the complaint without need of formal service of process such that IRI would be entitled to respond within 60 days rather than 20.

3. By IRI's calculation, its time to respond to the complaint extended to Monday, May 17, 2010.

4. Because of the press of other matters, IRI's counsel requested from Syncsort's counsel an extension of time to respond to the complaint until May 21, 2010.

5. Syncsort's counsel has agreed to such an extension.

6. Accordingly, IRI respectfully requests that the Court approve this request, and IRI has attached a proposed form of order.

Respectfully submitted,

K&L GATES LLP

Counsel for Defendant

Innovative Routines International, Inc.

/s/ Mark D. Marino
Mark D. Marino (MDM – 7587)

Of counsel:

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CERTIFICATE OF SERVICE

I certify that, on May 18, 2010, I filed the attached document with the Court's ECF system such that the following should receive service automatically:

Jeff H. Galloway, Esq.
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One Battery Park Plaza
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/s/ Mark D. Marino
Mark D. Marino (MDM – 7587)